

Thank you for your comment, Daniel Mecklenborg.

The comment tracking number that has been assigned to your comment is GLMRISBRS50008.

Comment Date: January 27, 2015 08:23:40AM

GLMRIS Brandon Road Scoping

Comment ID: GLMRISBRS50008

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Attachment: GLMRIS letter - Brandon Lock - 1 27 15.pdf

Comment Submitted:

INGRAM BARGE COMPANY

DANIEL P. MECKLENBORG
SENIOR VP, CHIEF LEGAL OFFICER and
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January 27, 2015

VIA ELECTRONIC SUBMISSION AT:

[HTTP://GLMRIS.ANL.GOV/BRANDON-RD/SCOPING-COMMENTS/](http://GLMRIS.ANL.GOV/BRANDON-RD/SCOPING-COMMENTS/)

The Great Lakes and Mississippi River
Interbasin Study (GLMRIS) Team – Brandon Road Scoping
231 S. LaSalle St., Suite 1500
Chicago, IL 60604

Re: Comments on the Brandon Road Scoping

Dear GLMRIS Team:

On behalf of Ingram Barge Company (“Ingram Barge”), I appreciate the opportunity to submit these comments to the U.S. Army Corps of Engineers (“ACOE”) and the Great Lakes and Mississippi River Interbasin Study Team (“GLMRIS”) on the Brandon Road Scoping. We appreciate the opportunity to submit our comments on this matter, and hope that you will find these comments helpful.

Ingram Barge Company: Who We Are

Ingram Barge is a leading inland marine transportation company and has operations throughout the Western Rivers and the Gulf Intracoastal Waterways. Our corporate headquarters are in Nashville, Tennessee, and our base of operations is in Paducah, Kentucky. We operate a fleet of over 150 towboats and over 4,000 barges.

Ingram Barge is an active member of the American Waterways Operators (“AWO”), the national trade association for the U.S. tugboat, towboat and barge industry. Ingram Barge fully supports AWO’s efforts and comments on this issue, and would encourage GLMRIS and ACOE to review closely the comments submitted by AWO in this process. Additionally, Ingram Barge is a member of the Illinois Chamber of Commerce, and supports the comments made by that organization as well and encourages GLMRIS and ACOE to take those into consideration.

Comments

As an owner and an operator of towboats and barges that traverse the Chicago Area Waterway System (“CAWS”), Ingram Barge is very concerned about what types of controls are chosen for that area. Therefore, at this time, it appears that further explanation on the proposed project at Brandon Road is needed, as so far, it has been difficult to perceive the true scope of the project.

INGRAM BARGE COMPANY

Thus, we hope that you will provide more solid information around the potential or planned activities at Brandon Lock.

Additionally, when formulating a plan or a study for the Brandon Lock, please consider that the lock facilitates transfer of goods in between the Great Lakes and the Mississippi River. As such, any barrier to a safe and efficient movement of goods should not be implemented, as it would negatively impact commerce and the economy. Any projects considered by the ACOE for the Brandon Lock area should fully evaluate the impact on the towing industry, its customers, and the U.S. economy. Additionally, safety issues should be evaluated if an electric barrier is considered for the Brandon Lock area, and the Coast Guard should be actively engaged in any new technology that would impact or be near the navigable channel. Finally, as WRRDA 2014 lays out a very precise way to evaluate and prioritize projects, this project should be considered based on that criteria and should address the basic direction from Congress.

Conclusion

In conclusion, thank you again for the opportunity to provide our comments on this important matter. We hope that the ACOE and GLMRIS team will consider our comments. If you have any questions, please do not hesitate to contact me.

Sincerely,



Daniel P. Mecklenborg